

**Amendments to the Drawings:**

The formal drawing Replacement Sheets attached in connection with the above-identified application containing Figures 1 and 4 being presented as new formal drawing sheets to be substituted for the previously submitted drawing sheets. The drawing figures 1 and 4 have been amended. The specific changes which have been made are listed below:

**FIGURE 1:**

In box 74, "Int." is changed to --Ext.--.

**FIGURE 4:**

Original reference number "368" is changed to --367-- and original reference number "367" is changed to --368--.

**REMARKS**

The Office Action mailed November 3, 2004 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-20 were pending in the application. Claims 1, 3, 6-8, 10, 12-16, and 19-20 have been amended, claims 21-23 are newly added, and no claims have been canceled. Therefore, claims 1-23 are pending in the application and are submitted for reconsideration.

FIGS. 1 and 4 have been amended to address the issues raised in the Office Action. Two formal drawing Replacement Sheets for these figures are attached hereto.

The specification has been amended to correct minor informalities noted in the Office Action. No new matter has been added.

This amendment changes and adds claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, are presented, with an appropriate defined status identifier.

The Office Action objected to claims 2, 3, 6, and 12 for minor informalities. With respect to claim 2, 6, and 12, applicants note that the antecedent basis support for "web service" is provided in the first line of the preamble of claim 1. Claim 3 has been amended to address the objection in the office action.

Claim 20 is rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Applicants have amended claim 20 in response to this rejection and submit that the pending claim 20 meets the current requirements of 35 U.S.C. § 101 for statutory subject matter as articulated by the federal courts. If the examiner disagrees, applicants respectfully request the examiner to contact the undersigned attorney.

Claims 6, 7, 8, 10, 13, 14, 15, and 16 are rejected under 35 U.S.C. § 1.112, second paragraph, for being indefinite. Applicants have amended these claims to address the issues raised in the Office Action and submit that these claims are now in definite form and meet the requirements of § 1.112, second paragraph.

In the Office Action, claims 1-12 and 17-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent 6,721,802 to Wright et al. (hereafter "Wright") in view of U.S. patent 6,584,480 to Ferrel et al. (hereafter "Ferrel"). Claims 13 and 16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Wright in view of U.S. patent

application US-2002/0069296 to Aua et al. (hereafter "Aua"). Claims 14 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Wright in view of U.S. patent application US-2003/0093565 to Berger et al. (hereafter "Berger"). Applicants respectfully traverse these rejections for at least the following reasons.

Each of the pending independent claims 1, 19, and 20 recite method (or system/software) that (1) receives content that includes non-image data, (2) obtains a style sheet that defines a conversion of the received content to a converted content; (3) selects an image conversion program based on a criteria; and (4) converts the content using the selected image conversion program and the style sheet. These recited features are not disclosed or suggested by the applied prior art.

Specifically, Wright relates to a system that uploads image data to a central server and resizes or resamples the image data at a remote terminal computer if required. As acknowledged in the office action, Wright does not disclose the use of a style sheet. Furthermore, Wright does not disclose converting content (including non-image data) to a converted data. It simply discloses using image standardization criteria (in terms of size, format, resolution or something similar) to convert raw image data into a standardized image data for convenient storage and retrieval. *See* col. 10, line 59 to col. 11, line 2 of Wright. Therefore, not only does Wright not disclose the use of a style sheet, it does not need a style sheet since the layout of the image content is not changed. Therefore, providing a style sheet to the Wright system would alter its principle of operation since Wright is not concerned with altering a layout of the content (for example, by eliminating portions of the contents indicative of advertisements or reordering of labeled items in the layout). Accordingly, several features of the pending claims are not disclosed or suggested by Wright.

The deficiencies of Wright are not cured by any of the other applied references. Accordingly, the Office Action fails to make a *prima facie* case of obviousness with respect to the pending claims.

Specifically, Ferrel relates to an *authoring* system for *producing* content for an on-line system. Accordingly, Ferrel does not also disclose receiving content comprising non-image data and converting the content to a converted content using both a style sheet and a selected *imaging conversion* program based on a criteria. Therefore, Ferrel discloses creating titles (or

page layouts) and content objects and storing these separately in contrast to the claimed storage or transmission of the converted content recited in the pending independent claims. Therefore, neither Ferrel nor Wright disclose or suggest all the features in the pending claims. Furthermore, as noted earlier, applying a page layout (at a rendering time, for example) as taught by Ferrel would be meaningless in the Wright system in which standardized image data is stored with no alterations to the layout contemplated by Wright.

Accordingly, applicants submit that a combination of Ferrel and Wright is improper since it would alter the principle of operation of Wright. Furthermore, even if they were combinable, they do not disclose all the features recited in the pending independent claims. In addition, these deficiencies of Wright and Ferrel are also not cured by any of the other applied references. Therefore, the pending independent claims are patentable over the applied prior art.

The dependent claims are also patentable for at least the same reasons as the independent claims on which they depend, respectively. In addition, they recite additional patentable features when considered as a whole.

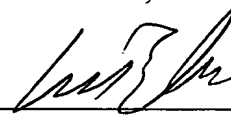
For example, new claims 21-23 recite that the converted content comprises image data (converted from received content containing non-image data). This recited feature provides an additional reason for the patentability of these claims.

In view of the foregoing amendments and remarks, applicant believes that the application is now in condition for allowance. If there are any questions regarding the application, or if an examiner's amendment would facilitate the allowance of one or more of the claims, the examiner is invited to contact the undersigned attorney at the local telephone number below.

Respectfully submitted,

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